

05/19/88

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Wally:

Thank you for giving Cyprus the opportunity to review the proposed effluent and monitoring requirements along with the calculations for maximum daily and monthly average effluent limits. Cyprus still questions the classification of the discharges(001 & 002) as industrial wastes streams. The effluent of each discharge is storm water, snow melt and base flow from the two tributaries of Thompson Creek. Below are some concerns that Cyprus has observed in the proposed final NPDES permit.

The "Technical Support Document for Water Quality based on Toxics Control", states that the LTA may be calculated using either percentile of probability, while the "Permit Writers Guide", states that the higher probability limit should be used. Neither document indicated which percentile of probability should be used. Could you please explain why the upper percentile limit was used in the prescribing effluent limits for Cyprus Thompson Creek.

Why is the 99th rather than the 95th percentile of probability used in calculating u in determining the LTA acute/chronic? When calculating the daily maximum and monthly average the 95th percentile of probability is used. Also, in deriving the "Goldbook" quality criteria for water quality the 95th percentile of confidence is used. Why isn't the use of the percentile rankings consistent throughout the whole derivation procedure.

Thank you for the opportunity to further comment on the above matter.

Sincerely,



Bert Doughty